Bureau of Nutrition and Health Services

State Review Summary Report

Ruthven-Ayrshire Comm School District (57240000)

December 13-15, 2016

Program Year: 2017

Month of Review: November

Lead Reviewer: Christine Crow

Org Representative(s):

Org - Level Findings

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
100 - Certification and Benefit Issuance	V-0100	Two students were determined as eligible for free benefits but their income application indicates they are reduced price eligible. Technical assistance provided to the authorized representative.	The authorized representative sent a letter notifying these families of their eligibility change and changed the point of service system to update the student's benefit status in 10 days. No further corrective action due at this time. No fiscal action required as it is less than the \$600 disregard.	
100 - Certification and Benefit Issuance	V-0100	When determining the eligibility status of income applications, the School Food Authority should only convert to the annual income frequency if there is more than one frequency of income reported. Technical assistance provided.	Describe how the School Food Authority will ensure that when determining the eligibility status of applications, the income is not converted to annual income when only one frequency is reported.	
200 - Verification	V-0200	Two applications were picked to be verified when only 1 application needed to be verified. The number of applications, not the number of free and/or reduced price students, must be used when determining the number of applications to verify. The district was to use the standard verification process (3%) when determining the number of applications to verify. Technical assistance provided.	Describe the School Food Authority's plan to verify the correct number of applications based on your verification sample size for the next school year.	
200 - Verification	V-0200	It is required that households provide the current, total amount of gross income and that the School Food Authority uses gross income when verifying the application. One of the applications that was picked to be verified was verified as free eligible based on the family's net income. When using the gross income, as required, the family was determined by State Agency to be reduced price eligible. The student on this application was found, after verification was completed, to be on the direct certification list in November, thus making him free eligible. No fiscal action required. Technical assistance provided.	Confirm that the verifying official will take the verification webinar next year prior to completing the verification process.	
	V-0700	Procurement: The School Food Authority participates in a purchasing group, has started a procurement plan that includes the written standards of conduct, and is aware of their small purchase threshold. Many elements were missing from the procurement plan including the Buy	Submit a copy of the debarment certification statement for the School Food Authority's milk and bread vendors. Describe the process, including who will be responsible, going forward, for ensuring that the procurement plan will include	

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		American Provision, language describing oversight ensuring contractors perform in accordance with terms, conditions, and specifications of their contracts, and the debarment certification statements. Despite belonging to a purchasing group, the School Food Authority also orders food from another primary vendor. They do not have any signed bid documents on file for the additional vendor and have not adequately procured this additional vendor. Technical assistance provided on requirements of the procurement plan and the procurement procedures for	all of the required elements and that all vendors will be properly procured.	
800 - Civil Rights	V-0800	small purchases and micro purchases. The USDA non-discrimination statement listed on program documents is not the most up to date statement. The most current statement can be found at the following website: https://www.educateiowa.gov/pk-12/nutrition-programs. If there is not enough room for the whole statement on a hardcopy document, the abbreviated statement can be used. Technical assistance provided.	Submit a copy of the menu with the most current statement (the abbreviated statement is acceptable).	
1000 - Local School Wellness Policy	V-1000	Every school district is required to have a wellness committee that reviews, develops, and implements the wellness policy. The school district must invite the following stakeholders to participate in the wellness committee: parents, students, board members, school administrators, physical education teachers, school health professionals, school food service staff, and the general public. There is no documentation available to show that a wellness committee exists or that the above mentioned stakeholders were invited to participate.	Describe how the school district plans on implementing a wellness committee, how they will ensure all required stakeholders are invited to participate and a timeline of when the first wellness committee meeting will take place.	
1000 - Local School Wellness Policy	V-1000	Each school within the district must assess their implementation of the Local School Wellness Policy goals at least every three years and make this assessment available to the public. There is not an assessment available documenting the school's implementation of the Local School Wellness Policy goals. Technical assistance, including the Team Nutrition School Wellness resource folder provided.	Describe the timeline of when the school district will have this assessment completed and what stakeholders will participate in completing this assessment. Describe how this assessment will be made available to the public.	
1100 - Smart Snacks	V-1100	The flavored propel water, Fruit2O, Vitamin Water, and Powerade Zero were found in a vending machine that is on during the school day and are not approved beverages for K-8th grade students. Although it is acceptable for 9-12 grade students, the beverages must be Smart Snack approved for the youngest grade group that has access to purchase the product. The Fruit by the Foot, Grandma's peanut butter cookies, and Ruffles oven baked cheddar and sour cream chips are found in vending that is on during the school day and are not approved Smart Snacks. Any product available for purchase during the school day, which is defined as midnight until 30 minutes after the final bell rings, must meet Smart Snack requirements for the lowest grade group that has access. Snack items must be less than 200 calories, have less than 200 mg sodium, less than 35% of weight from total sugar, less than 35% total fat	both vending machines, meet Smart Snack requirements for all grade groups. Confirm that the unapproved items described in the finding, will no longer be ordered and available for purchase to students during the school day.	

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		from calories and if it is a grain item, it must be whole grain rich. The School Food Authority is strongly encouraged to use and keep on file, the nutrition calculator printouts available at the following link (https://foodplanner.healthiergeneration.org/) when deciding if a food meets Smart Snack requirements. Technical assistance and smart snacks handout provided.		
1200 - Professional Standards	V-1200		Describe who will begin tracking the professional standards training hours for all staff with school nutrition program responsibilities and how often this tool will be updated. Attach a copy of the tracking tool completed for this school year.	
1200 - Professional Standards	V-1200	The authorized representative works less than 20 hours per week in the school nutrition program and therefore needs to have 4 hours of professional standards training. When State Agency was on-site, 2.5 hours of professional standards training documentation was available for the authorized representative. Technical assistance provided.	Describe how the authorized representative will receive the remainder of the required training hours (1.5 hours) during this school year. Include training topics and dates of when training will occur.	
1600 - School Breakfast and SFSP Outreach	V-1600	School districts are required to provide Summer Food Service Program (SFSP) outreach to families annually even if they do not have a SFSP. Technical assistance, including SFSP promotional resources, provided.	Describe how the School Food Authority will provide SFSP outreach to families.	

Site - Level Findings: Ruthven-Ayrshire High School (0109)

Area	Findings ID	Finding Description	Required Corrective Action	Corrective Action Response
400 - Meal Components and Quantities - Breakfast	V-0400	Signage must be posted to inform students and staff what constitutes a reimbursable meal. Although there was signage for lunch, there was not signage describing the menu components offered and how they can make up a reimbursable meal for breakfast. Technical assistance and examples of signage provided.	Indicate where the breakfast signage will be posted and who will be responsible for daily updates of the menus.	
400 - Meal Components and Quantities - Breakfast	V-0400	In four of the five days during the review period, the breakfast food production records only included ½ cup 100% juice as the fruit component therefore making the daily and weekly fruit requirements short of the required portions. In order for a breakfast meal to be reimbursable, the school food authority must offer 1 cup of fruit and/or juice to students. Juice can only count for 50% of the fruit served throughout the week. According to the menus and food production record documentation, the breakfast meals served on 11/02/2016, 11/09/16, 11/16/16, and 11/30/16 did not contain a grain component. Students must be offered a grain, fruit, and milk item at breakfast to count it as a reimbursable meal. Since no grain component was available to students, the breakfast meals served on these days are not reimbursable. No fiscal action required as it is less than the \$600 disregard.		

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		The breakfast food production records were incomplete as they did not document the serving size of all items served, or the total quantity of food prepared written in a measurable amount. Both the serving sizes and total quantity of food prepared must be documented in a measurable amount such as cups, pounds, ounces etc. Handout provided. Technical assistance provided on breakfast and food production requirements.		
400 - Meal Components and Quantities - Lunch	V-0400		Describe how the School Food Authority will change this menu going forward to ensure that all grade groups served receive the required amounts of all menu components.	
400 - Meal Components and Quantities - Lunch	V-0400	The lunch menus and food production records for the review period indicated that the daily requirement of ¾ cup of vegetables for the K-8 students was not available. Students had ½ cup of vegetables available 3 days, ¼ cup of vegetables one day, and 5/8 cup another day, thus making the menu short on the daily and weekly vegetable requirements. The weekly requirements for red/orange (3/4 cup) and dark green (1/2 cup) vegetables were also not met for the K-8th grade students. The 9-12th grade lunch menus and food production records reviewed during the review period, indicated that the minimum grain requirement was not met on 11/08/16 as only 1 ounce grain equivalent was offered and 2 ounce grain equivalents are required for this grade group. The meat/meat alternate offered on 11/08/16 did not meet the required serving size as there was only 1.5 ounces offered when 2 ounces is required. The serving of vegetables offered to this grade group on 11/10/16 did not meet the daily requirement of 1 cup as only ½ cup vegetable was offered. Lettuce was offered on this day and lettuce only credits for half of the serving size. Because the amounts of the grain, meat/meat alternate and vegetable were short on these days, the weekly requirements were not met. The lunch food production records are incomplete as some items offered are missing their serving size, the total quantity of menu items prepared is not documented in a measurable amount (cups, ounces, pounds or #10 cans), and the actual number of students who ate is not documented. Technical assistance and handout provided. All homemade combination menu items served must have a standardized recipe that includes the ingredients, the weight or measurement of those ingredients, instructions, pan and utensil size to be used, critical control points, a portion size, and how that portion size credits towards the meal pattern. Although many recipes were on file, there was no tator tot casserole recipe that was served during the week of review. Without a standardized recipe, the	daily and weekly requirements, including all of the vegetable subgroups, were offered to both the 9-12 and the k-8th grade students. Submit an individualized standardized recipe for the tator tot casserole. Describe how the School Food Authority will ensure that all grains served will be whole grain rich.	

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	alternated was served or how much potato was served through this entrée. Unless there is a whole grain exemption, 100% of grains offered must be whole grain rich. Many items found on the menu and in storage are not whole grain rich including the English muffin, saltine crackers, Frosted Flakes cereal, Grandmas cookies, Famous Amos cookies, blueberry muffins, breaded fish sticks. Technical assistance provided.		
1400 - Food Safety	Analysis and Critical Control Point (HACCP) food safety plan available. The district did not have a food safety plan available on-site. Iowa State University Extension and	Submit a table of contents and one standard operating procedure that has been individualized to meet the school's needs. Describe the School Food Authority's timeline of when the HACCP plan will be completed.	

Org - Level Technical Assistance

Area	Question	Comments
		All income applications are confirmed of their determined eligibility status. Only applications to be verified must be confirmed. Technical assistance provided.
100 - Certification and Benefit Issuance	105 How long does the application's approval take from the date the SFA receives the application from the household?	The income applications that were turned in prior to the first day of school, had an effective date that was more than 10 calendar days from the received date or there was not a received date listed. The School Food Authority clarified that the effective date documented on the applications that were submitted prior to the first day of school, is the date that school started and not when the application was actually approved. State Agency clarified that the effective date is the date that the application was approved and the received date is when the application was received by the School Food Authority. All applications must be determined within 10 days of being received. Technical assistance provided.
100 - Certification and Benefit Issuance	120 How and when are the following changes made to the point of service and benefit issuance document:	Transfer students do not need to complete a new application if a current one is available at another school district. The School Food Authority can request a copy of the application from the previous school district and use that eligibility status for the remainder of the school year. Technical assistance provided.
1200 - Professional Standards	1207 a. Has the State Agency allowed the SFA flexibility to complete annual training requirements over a 2-year period?	The State Agency allows the School Food Authority to complete the annual training requirements over a two year period. Training can only be counted towards one school year's requirements and civil rights training is required annually regardless of the total number of professional standards hours accumulated.
200 - Verification	201 Who serves as the SFA's verifying official? (Name and/or position title)	The verifying official is the person who completed the verification process. The confirming official is the person who confirmed that the original eligibility status was accurately determined, prior to notifying the family that

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	they were selected for verification. The individual listed as the verifying official is actually the person who was the confirming official. Technical assistance provided.
800 - Civil Rights	The diet modification form is not being used to document special dietary needs. This form must be signed by a prescribing official and provided to the School Food Authority by any families who wish to have the School Food Authority provide alternative menu items in order to accommodate their student's dietary needs. Technical assistance, including the diet modification form and instructions, was provided to the School Food Authority.

Site - Level Technical Assistance Ruthven-Ayrshire High School (0109)

Area	Question	Comments
		On 11/07/16, leftover coleslaw was offered as a free side dish and students were allowed to help themselves to their serving size of choice. During the observed lunch meal, it was also noted that pre-packaged margarine was available for high school students as well. The margarine and leftover coleslaw were removed before the K-8th grade students arrived for lunch. These items were placed after the point of service, on a table without temperature control or sneeze guards, and no one was monitoring the serving sizes picked. For food safety reasons, leftovers should not be available on a table in the cafeteria for students to help themselves to. Technical assistance and alternative ideas discussed.
		Although many Child Nutrition (CN) labels were taken directly from the box as required, some were product information statements provided by the vendor or printed from the internet. Technical assistance and handout offered on approved CN labels and Product Formulation Statements.
400 - Meal Components and Quantities - Breakfast	401 Did all meals observed and counted for reimbursement for the day of review contain all of the required meal components?	One student who was counted and claimed as receiving a reimbursable breakfast did not have ½ cup fruit and therefore did not a receive a reimbursable meal. A reimbursable breakfast for offer versus serve must consist of 3 items, one of which must be ½ cup fruit or 1/2 cup 100% juice. All other students had a reimbursable breakfast. Technical assistance provided.

Org - Level Commendations

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CERTIFICATION AND BENEFIT ISSUANCE: The School Food Authority provides a 30 day carryover of the previous year's eligibility status to all families. The School Food Authority sends out a State Agency approved letter to notify all families who applied for benefits, including the families denied benefits and those families on the direct certification list. The School Food Authority uses ICAVES to determine eligibility status and error prone applications. The current income guidelines and the current application were utilized. Benefits are extended to all children who are members within the household. The ethnic racial form was completed and no discrimination was observed in the determination of eligibility status.

CIVIL RIGHTS: The public release was sent to the local newspaper and published on August 24, 2016 and documentation of this was on file. Civil Rights training was provided on 8/22/2016, as proven with adequate documentation, to all staff that have responsibilities within the school nutrition program. The School Food Authority works with students that special dietary needs to ensure they get the foods they need to accommodate their needs. The "And Justice For All" poster was on display in a public location. The school district has a compliant policy on file.

FOOD SAFETY: The last 2 food safety inspection reports are posted in a public location. The temperatures for all milk coolers, refrigerators, freezers, and food is monitored, recorded and kept on file for at least 6 months. Good food safety practices were observed during lunch and breakfast. The food service director is ServSafe certified.

MEAL COUNTING AND CLAIMING: All students who were counted and claimed had a reimbursable meal on the day that the State Agency observed lunch service. The point of service line was organized and orderly for both breakfast and lunch. The number of paid, reduced price, and free lunches claimed on 12/13/16 and breakfast meals claimed on 12/14/16 did not exceed the number of students enrolled within the eligibility categories and is reasonable when compared to the month of review. The edit check numbers matched the November claim numbers for each eligibility status. The November edit check numbers did not exceed the total number of students enrolled.

NUTRITIONAL QUALITY AND MEAL PATTERN: Daily dated food production records and menus were on file for all of the meals claimed. Many Child Nutrition (CN) labels and standardized recipes were on file for combination foods. For the review period, the K-8th grade student's lunch menus and food production records indicated that the daily and weekly serving requirements were met for the bean/peas (legumes), starchy and other vegetable subgroups, as well as the grain, fruit, meat/meat alternate, and the milk component requirements. For the review period, the 9-12th grade student's lunch menus and food production records indicated that the daily and weekly dark green, beans/peas (legumes), starchy, and other vegetable subgroups, fruit, grains and milk component requirements were met. -Desserts were limited to no more than 2 ounces per week during the review period. Two of the approved types of milk were made available to students. Posters promoting healthy foods were displayed in the cafeteria. Signage was on display describing what a reimbursable lunch consisted of. All grains offered to students during the lunch week of review were whole grain rich. Homemade items are frequently served and a variety of meat/meat alternates are offered to the students. Good team work was observed within the school nutrition program and staff throughout the school provided support to the food service staff as needed.

PROFESSIONAL STANDARDS: The food service director has met the training requirements for the 2016-2017 school year. The full time nutrition staff have received some of the required hours of professional standards training and the food service director has a plan to ensure they receive the remaining required training hours. Adequate documentation is on file to support all training received. Civil rights training was offered to all staff with responsibilities within the school nutrition program and adequate documentation was on file to support this training.

REPORTING AND RECORD KEEPING: The School Food Authority saves all documentation for at least 3 years plus the current year.

RESOURCE MANAGEMENT: According to the 2014-2015 School Nutrition Program financial report, the non-program food revenue adequately covers the cost of the non-program food and the School Food Authority's account balance does not exceed the 3 month operating balance. The food service director effectively utilizes the commodity foods when purchasing menu items.

SCHOOL BREAKFAST AND SUMMER FOOD SERVICE OUTREACH: School breakfast outreach is conducted annually and throughout the school year reminding families that breakfast is available through the school nutrition program.

SCHOOL WELLNESS POLICY: The Local Wellness Policy was reviewed by the School Board was reviewed within the past 3 years as required (7/13/2015) and is available to the public on the district's website. The Local Wellness Policy contains all of the required elements.

VERIFICATION: The School Food Authority picked their applications to verify from error prone applications, which were determined through their use of ICAVES. All applications to be verified were notified with a State Agency approved letter of notification. Results of verification were also provided through the State Agency letter. Income application eligibility status was reviewed and confirmed by a confirming official prior to notifying families that they were picked to be verified. The verification procedure and the verification report were completed on time. The verification training was taken by the authorized representative.

WATER: Free, potable water is available to all grade groups during lunch and breakfast.